



September 30, 1997

John G. Colligan

[Energy Information Administration](#)

Coal and Electric Data and Renewables Division

EI-524, U.S. Department of Energy

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Washington, D.C. 20585-0650

Subject: US DOE/EIA notice requesting comment published in the Federal Register: July 29, 1997, (Volume 62, Number 145)

Dear Mr. Colligan:

The Washington Department of Community, Trade and Economic Development (CTED), Energy Division (Energy Division) appreciates the opportunity to comment on Energy Information Administration (EIA) data collection efforts in the electric utility industry. The rapid changes that are occurring in the industry and restructuring activities at the state, regional, and federal levels make access to good energy data more important than ever. The Energy Division welcomes EIA proposals to strengthen its data collection efforts by reaching beyond the traditional, regulated utility for electricity production data and by collecting more information on electric system disturbances and power outages.

The Energy Division has numerous functions, all of which rely on good energy data. The Energy Division provides the Governor, Legislature, and other agencies such as the Utilities and Transportation Commission (UTC) and the Northwest Power Planning Council (NWPPC), with information, analysis, and expert testimony to facilitate the inclusion of public interest criteria into state, regional, and national energy policy. Energy Division personnel served as staff to the recently-completed Comprehensive Review of the Northwest Energy System and continue to participate in follow-up discussions regarding the future of the Bonneville Power Administration (BPA). In addition, staff has participated and will continue to participate in numerous discussions regarding state restructuring legislation. The Energy Division also administers the Governor's energy emergency powers through coordination of responses to petroleum and electricity supply shortages, analysis of energy sufficiency, provision of energy for essential service providers, and many other activities. Finally, the Energy Division has a statutory mandate to maintain a repository of data on energy production, consumption and expenditures in

Washington state, and publishes the *Washington State Energy Use Profile* to inform policy-makers and others about energy consumption, price and expenditure trends in Washington.

Although additional sources of data, such as the BPA, NWPPC, Edison Electric Institute and the UTC, are called upon to round out the energy picture, no source other than EIA maintains comprehensive, multi-fuel, state-specific core energy data. In addition, many traditional sources of utility sector data are drying up as competition becomes the norm. BPA, for example, no longer releases the terms of many of its power supply contracts. Information on non-utility generation is spotty at best, making it difficult to assess the adequacy of existing resources to serve loads under various emergency conditions.

Because the Energy Division's use of many data streams is irregular, depending on the nature issue at hand, it is difficult to state with any degree of specificity the use the Energy Division is likely to have for the proposed new data. However, we can anticipate the need for certain data and point to past instances when the Energy Division made use of data like those that EIA collects or proposes to collect:

- During the 1997 legislative session, in response to a proposal to eliminate the tax on fossil fuels used for electric generation, the Energy Division compiled a list of all state electric generation facilities and estimated the power produced annually by each.
- During the Comprehensive Review of the Northwest Energy System, the Energy Division used aggregate generation prices for the Northwest to evaluate the likelihood that BPA power would continue to be priced above market after the expiration of current contracts in 2001.
- When major electric power outages occur, the Energy Division collects and provides information to the State Emergency Operations Center on the number of customers affected in each county. This information is collected on a utility by utility basis. Emergency Management uses this information to determine the magnitude of the problem in impacted counties when outages or other emergencies occur.
- The information that will be collected via new form EIA-417A will be very important to the work that the Energy Division does in the area of reliability and electric industry restructuring. In addition, the information will be valuable in analyzing the impact of and answering requests for information on the effects of energy emergency events such as the major power outages in the western United States in the summer of 1996 and the power outages in Washington resulting from winter storms in 1996 and 1997.
- Both federal and state electricity restructuring legislation is likely to include funding for public purpose activities - energy efficiency, renewable resources, low income weatherization, research and development, low income bill assistance, and other activities. Annual information, preferably at a state level but at least at the utility level, on amount of funds collected and expended for these purposes would be helpful for comparisons with past efforts and efforts of other states to fund these programs. These data should include public purpose accomplishments: kWh savings, number of low income homes weatherized, amount of renewable energy generated. For these reasons we are concerned about the proposed reduction in the demand side management questions, (Schedule V) of Form 861, to 2 pages from 5. Without knowing which specific responses will be eliminated, we cannot project how the current published information will be

affected. But we disagree strongly with the statement "[T]he need for DSM data are diminishing as restructuring/unbundling throughout the industry takes place" which appears in the notice. We can envision a greater need, and a need for EIA to keep up-to-date regarding whom to target as respondents following the implementation of restructuring legislation. We accept that utilities may not be the only respondents, but we assume that the information collected in Schedule V of Form 861 will still be needed.

In summary, the Energy Division of CTED relies heavily on EIA data collection efforts to inform its role in state and regional processes, and is concerned that the rapid changes currently taking place in the industry will make it more difficult for policy-makers to get the information they need to make informed choices. The Energy Division urges EIA, the Department of Energy, and Congress to maintain and expand EIA's authority to collect electric utility sector data.

We appreciate all of the work EIA has done to keep high quality energy information flowing. We hope to follow up with more detailed comments and more encouragement. In the meantime, please contact Arne Olson, our staff economist, at (360) 956-2022, if you have any questions about what we have written.

K.C. Golden
Assistant Director